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ALAMEDA COUNTY

February 20, 2015

CLERK OF
THE SUPERIOR COURT
By Burt Moskaira, Deputy

CASE NUMBER:

RG15759461

1 WILLIAM F. WRAITH, SBN 185927
2 WRAITH LAW
3 24422 Avenida de la Carlota, Suite 400
4 Laguna Hills, CA 92653
5 Tel: (949) 452-1234
6 Fax: (949) 452-1102

7 Attorneys for Plaintiff
8 ENVIRONMENTAL RESEARCH CENTER

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF ALAMEDA

11 ENVIRONMENTAL RESEARCH CENTER,
12 a non-profit California corporation,

13 Plaintiff,

14 v.

15 MULTIVITAMIN DIRECT, individually and
16 doing business as RAW GREEN ORGANICS
17 and RAW JUVENATE,

18 Defendants.

Case No.

**COMPLAINT FOR INJUNCTIVE
RELIEF AND CIVIL PENALTIES**

Health & Safety Code §25249.5, *et seq.*

19 Plaintiff Environmental Research Center ("PLAINTIFF" or "ERC") brings this action
20 in the interests of the general public and, on information and belief, hereby alleges:

INTRODUCTION

21 1. This action seeks to remedy the continuing failure of Defendants
22 MULTIVITAMIN DIRECT, individually and doing business as RAW GREEN ORGANICS
23 and RAW JUVENATE (collectively "DEFENDANTS") to warn consumers in California that
24 they are being exposed to lead, a substance known to the State of California to cause cancer,
25 birth defects, and other reproductive harm. DEFENDANTS manufacture, package, distribute,
26 market, and/or sell in California certain products containing lead (collectively, the
"PRODUCTS"):

- Raw Green Organics RawJuvenate Organic Vegan Protein Vanilla Flavor
- Raw Green Organics RawJuvenate Organic Super Greens

1. Lead (hereinafter, the “LISTED CHEMICAL”) is a substance known to the State¹ of California to cause cancer, birth defects, and other reproductive harm.

2. The use and/or handling of the PRODUCTS causes exposures to the LISTED CHEMICAL at levels requiring a “clear and reasonable warning” under California's Safe Drinking Water and Toxic Enforcement Act of 1986, Health & Safety Code (“H&S Code”) §25249.5, *et seq.* (also known as “Proposition 65”). DEFENDANTS have failed to provide the health hazard warnings required by Proposition 65.

3. DEFENDANTS’ past sales and continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS without the required health hazard warnings, cause individuals to be involuntarily and unwittingly exposed to levels of the LISTED CHEMICAL that violate Proposition 65.

4. PLAINTIFF seeks injunctive relief enjoining DEFENDANTS from the continued manufacturing, packaging, distributing, marketing and/or sales of the PRODUCTS in California without provision of clear and reasonable warnings regarding the risks of cancer, birth defects, and other reproductive harm posed by exposure to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS. PLAINTIFF seeks an injunctive order compelling DEFENDANTS to bring their business practices into compliance with Proposition 65 by providing a clear and reasonable warning to each individual who has been and who in the future may be exposed to the LISTED CHEMICAL from the use of the PRODUCTS. PLAINTIFF also seeks an order compelling DEFENDANTS to identify and locate each individual person who in the past has purchased the PRODUCTS, and to provide to each such

¹ All statutory and regulatory references herein are to California law, unless otherwise specified.

1 purchaser a clear and reasonable warning that the use of the PRODUCTS will cause exposures
2 to the LISTED CHEMICAL.

3 5. In addition to injunctive relief, PLAINTIFF seeks an assessment of civil penalties
4 up to the maximum civil penalty of \$2,500 per day per exposure authorized by Proposition 65
5 to remedy DEFENDANTS' failure to provide clear and reasonable warnings regarding
6 exposures to the LISTED CHEMICAL.

7 **JURISDICTION AND VENUE**

8 6. This Court has jurisdiction over this action pursuant to California Constitution
9 Article VI, Section 10, which grants the Superior Court "original jurisdiction in all causes
10 except those given by statute to other trial courts." The statute under which this action is
11 brought does not specify any other basis for jurisdiction.

12 7. This Court has jurisdiction over DEFENDANTS because, based on information and
13 belief, DEFENDANTS are businesses having sufficient minimum contacts with California, or
14 otherwise intentionally availing themselves of the California market through the distribution
15 and sale of the PRODUCTS in the State of California to render the exercise of jurisdiction over
16 them by the California courts consistent with traditional notions of fair play and substantial
17 justice.

18 8. Venue in this action is proper in the Alameda Superior Court because the
19 DEFENDANTS have violated California law in the County of Alameda.

20 9. On May 23, 2014, PLAINTIFF sent a 60-Day Notice of Proposition 65 ("Notice")
21 violations to the requisite public enforcement agencies, and to DEFENDANTS. The Notice
22 was issued pursuant to, and in compliance with, the requirements of H&S Code §25249.7(d)
23 and the statute's implementing regulations regarding the notice of the violations to be given to
24 certain public enforcement agencies and to the violators. The Notice included, *inter alia*, the
25 following information: the name, address, and telephone number of the noticing individuals;
26 the name of the alleged violators; the statute violated; the approximate time period during

1 which violations occurred; and descriptions of the violations, including the chemicals involved,
2 the routes of toxic exposure, and the specific product or type of product causing the violations,
3 and was issued as follows:

- 4 a. DEFENDANTS were provided a copy of the Notice by Certified Mail.
- 5 b. DEFENDANTS were provided a copy of a document entitled “The Safe
6 Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A
7 Summary,” which is also known as Appendix A to Title 27 of CCR §25903.
- 8 c. The California Attorney General was provided a copy of the Notice via
9 online submission.
- 10 d. The California Attorney General was provided with a Certificate of Merit by
11 the attorney for the noticing parties, stating that there is a reasonable and
12 meritorious case for this action, and attaching factual information sufficient
13 to establish a basis for the certificate, including the identity of the persons
14 consulted with and relied on by the certifier, and the facts, studies, or other
15 data reviewed by those persons, pursuant to H&S Code §25249.7(h) (2).

16 10. At least 60-days have elapsed since PLAINTIFF sent the NOTICE to
17 DEFENDANTS. The appropriate public enforcement agencies have failed to commence and
18 diligently prosecute a cause of action under H&S Code §25249.5, *et seq.* against
19 DEFENDANTS based on the allegations herein.

20 **PARTIES**

21 11. PLAINTIFF is a non-profit corporation organized under California’s Corporation
22 Law. ERC is dedicated to, among other causes, reducing the use and misuse of hazardous and
23 toxic substances, consumer protection, worker safety, and corporate responsibility.

24 12. ERC is a person within the meaning of H&S Code §25118 and brings this
25 enforcement action in the public interest pursuant to H&S Code §25249.7(d).
26

13. Defendants MULTIVITAMIN DIRECT, individually and doing business as RAW GREEN ORGANICS and RAW JUVENATE are businesses of unknown form and are each a person doing business within the meaning of H&S Code §25249.11.

14. DEFENDANTS have manufactured, packaged, distributed, marketed and /or sold the PRODUCTS for sale or use in California and the County of Alameda. ERC is informed and believes, and thereupon alleges, that DEFENDANTS continue to manufacture, package, distribute, market and/or sell the PRODUCTS for sale or use in California and in Alameda County.

STATUTORY BACKGROUND

15. The People of the State of California have declared in Proposition 65 their right "[t]o be informed about exposures to chemicals that cause cancer, birth defects, or other reproductive harm." (Section 1(b) of Initiative Measure, Proposition 65).

16. To effect this goal, Proposition 65 requires that individuals be provided with a "clear and reasonable warning" before being exposed to substances listed by the State of California as causing cancer or reproductive toxicity. H&S Code §25249.6 states, in pertinent part:

No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual....

17. “‘Knowingly’ refers only to knowledge of the fact that a discharge of, release of, or exposure to a chemical listed pursuant to Section 25249.8(a) of the Act is occurring. No knowledge that the discharge, release or exposure is unlawful is required.” (27 California Code of Regulations (“CCR”) § 25102(n).)

18. Proposition 65 provides that any person “violating or threatening to violate” the statute may be enjoined in a court of competent jurisdiction. (H&S Code §25249.7). The phrase “threatening to violate” is defined to mean creating “a condition in which there is a substantial

likelihood that a violation will occur.” (H&S Code §25249.11(e)). Violators are liable for civil penalties of up to \$2,500 per day for each violation of the Act. (H&S Code §25249.7.)

FACTUAL BACKGROUND

19. On February 27, 1987, the State of California officially listed the chemical lead as a chemical known to cause reproductive toxicity. Lead became subject to the warning requirement one year later and was therefore subject to the “clear and reasonable” warning requirements of Proposition 65 beginning on February 27, 1988. (27 CCR § 25000, *et seq.*; H&S Code §25249.5, *et seq.*). Due to the high toxicity of lead, the maximum allowable dose level for lead is 0.5 ug/day (micrograms a day) for reproductive toxicity. (27 CCR § 25805(b).)

20. On October 1, 1992, the State of California officially listed the chemicals lead and lead compounds as chemicals known to cause cancer. Lead and lead compounds became subject to the warning requirement one year later and were therefore subject to the “clear and reasonable” warning requirements of Proposition 65 beginning on October 1, 1993 (27 CCR § 25000, *et seq.*; H&S Code §25249.6 *et seq.*). Due to the carcinogenicity of lead, the no significant risk level for lead is 15 ug/day (micrograms a day). (27 CCR § 25705(b)(1).)

21. To test DEFENDANTS PRODUCTS for lead, PLAINTIFF hired a well-respected and accredited testing laboratory. The results of testing undertaken by PLAINTIFF of DEFENDANTS’ PRODUCTS show that the PRODUCTS tested were in violation of the 0.5 ug/day “safe harbor” daily dose limit set forth in Proposition 65’s regulations. Very significant is the fact that people are being exposed to lead through ingestion as opposed to other not as harmful methods of exposure such as dermal exposure. Ingestion of lead produces much higher exposure levels and health risks than does dermal exposure to this chemical.

22. At all times relevant to this action, DEFENDANTS, therefore, have knowingly and intentionally exposed the users and/or handlers of the PRODUCTS to the LISTED CHEMICAL without first giving a clear and reasonable warning to such individuals.

1 23. The PRODUCTS have allegedly been sold by DEFENDANTS for use in
2 California since at least May 23, 2011. The PRODUCTS continue to be distributed and
3 sold in California without the requisite warning information.

4 24. On May 23, 2011, ERC served DEFENDANTS and each of the appropriate public
5 enforcement agencies with a Proposition 65 Notice, a document entitled “Notice of Violations
6 of California Health & Safety Code Section 25249.5” that provided DEFENDANTS and the
7 public enforcement agencies with notice that DEFENDANTS were in violation of Proposition
8 65 for failing to warn purchasers and individuals using the PRODUCTS that the use of the
9 PRODUCTS exposes them to lead, a chemical known to the State of California to cause cancer
10 and/or reproductive toxicity (a true and copy of the 60-Day Notice is attached hereto as
11 **Exhibit A** and incorporated by reference).

12 25. As a proximate result of acts by DEFENDANTS, as persons in the course of doing
13 business within the meaning of Health & Safety Code §25249.11, individuals throughout the
14 State of California, including in the County of Alameda, have been exposed to the LISTED
15 CHEMICAL without a clear and reasonable warning. The individuals subject to the illegal
16 exposures include normal and foreseeable users of the PRODUCTS, as well as all other
17 persons exposed to the PRODUCTS.

18 **FIRST CAUSE OF ACTION**
19 **(Injunctive Relief for Violations of Health and Safety Code § 25249.5, *et seq.* concerning**
20 **the PRODUCTS described in the May 23, 2014, Prop. 65 Notice)**
 Against DEFENDANTS

21 27. PLAINTIFF re-alleges and incorporates by reference Paragraphs 1 through
22 26, inclusive, as if specifically set forth herein.

23 28. By committing the acts alleged in this Complaint, DEFENDANTS, at all times
24 relevant to this action, and continuing through the present, have violated H&S Code §25249.6
25 by, in the course of doing business, knowingly and intentionally exposing individuals who use
26 or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first

1 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§
2 25249.6 and 25249.11(f).

3 29. By the above-described acts, DEFENDANTS have violated H&S Code §
4 25249.6 and are therefore subject to an injunction ordering DEFENDANTS to stop violating
5 Proposition 65, to provide warnings to all present and future customers, and to provide warnings
6 to DEFENDANTS' past customers who purchased or used the PRODUCTS without receiving a
7 clear and reasonable warning.

8 30. An action for injunctive relief under Proposition 65 is specifically authorized by
9 Health & Safety Code §25249.7(a).

10 31. Continuing commission by DEFENDANTS of the acts alleged above will
11 irreparably harm the citizens of the State of California, for which harm they have no plain,
12 speedy, or adequate remedy at law.

13 Wherefore, PLAINTIFF prays for judgment against DEFENDANTS, as set forth
14 hereafter.

15 **SECOND CAUSE OF ACTION**
16 **(Civil Penalties for Violations of Health and Safety Code § 25249.5, *et seq.* concerning the**
17 **PRODUCTS described in PLAINTIFF's NOTICE)**
Against DEFENDANTS

18 32. PLAINTIFF re-alleges and incorporates by reference Paragraphs 1 through 31,
19 inclusive, as if specifically set forth herein.

20 33. By committing the acts alleged in this Complaint, DEFENDANTS at all times
21 relevant to this action, and continuing through the present, have violated H&S Code §25249.6
22 by, in the course of doing business, knowingly and intentionally exposing individuals who use
23 or handle the PRODUCTS set forth in the Notice to the LISTED CHEMICAL, without first
24 providing a clear and reasonable warning to such individuals pursuant to H&S Code §§
25 25249.6 and 25249.11(f).

26 34. By the above-described acts, DEFENDANTS are liable, pursuant to H&S Code

§25249.7(b), for a civil penalty of \$2,500 per day per violation for each unlawful exposure to the LISTED CHEMICAL from the PRODUCTS.

Wherefore, PLAINTIFF prays for judgment against DEFENDANTS, as set forth hereafter.

THE NEED FOR INJUNCTIVE RELIEF

35. PLAINTIFF re-alleges and incorporates by this reference Paragraphs 1 through 34, as if set forth below.

36. By committing the acts alleged in this Complaint, DEFENDANTS have caused irreparable harm for which there is no plain, speedy or adequate remedy at law. In the absence of equitable relief, Defendants will continue to create a substantial risk of irreparable injury by continuing to cause consumers to be involuntarily and unwittingly exposed to the LISTED CHEMICAL through the use and/or handling of the PRODUCTS.

PRAYER FOR RELIEF

Wherefore, PLAINTIFF accordingly prays for the following relief:

A. a preliminary and permanent injunction, pursuant to H&S Code §25249.7(b), enjoining DEFENDANTS, their agents, employees, assigns and all persons acting in concert or participating with DEFENDANTS, from distributing or selling the PRODUCTS in California without first providing a clear and reasonable warning, within the meaning of Proposition 65, that the users and/or handlers of the PRODUCTS are exposed to the LISTED CHEMICAL;

B. an injunctive order, pursuant to H&S Code §25249.7(b), compelling DEFENDANTS to identify and locate each individual who has purchased the PRODUCTS since May 23, 2011, and to provide a warning to such person that the use of the PRODUCTS will expose the user to chemicals known to birth defects and other reproductive harm;

C. an assessment of civil penalties pursuant to Health & Safety Code §25249.7(b), against Defendants in the amount of \$2,500 per day for each violation of Proposition 65;

D. an award to PLAINTIFF of its reasonable attorney's fees and costs of suit

1 pursuant to California Code of Civil Procedure §1021.5, as PLAINTIFF shall specify in further
2 application to the Court; and,

3 E. such other and further relief as may be just and proper.
4

5 Dated: _____, 2015

WRAITH LAW

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7 By: _____
8 WILLIAM F. WRAITH
9 Attorney for Plaintiff Environmental
10 Research Center
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Exhibit A

WRAITH LAW
16485 LAGUNA CANYON ROAD
SUITE 250
IRVINE, CALIFORNIA 92618
Tel (949) 251-9977
Fax (949) 251-9978

May 23, 2014

**NOTICE OF VIOLATIONS OF
CALIFORNIA HEALTH & SAFETY CODE SECTION 25249.5 ET SEQ.
(PROPOSITION 65)**

Dear Alleged Violator and the Appropriate Public Enforcement Agencies:

I represent Environmental Research Center (“ERC”), 3111 Camino Del Rio North, Suite 400, San Diego, CA 92108; Tel. (619) 500-3090. ERC’s Executive Director is Chris Heptinstall. ERC is a California non-profit corporation dedicated to, among other causes, helping safeguard the public from health hazards by bringing about a reduction in the use and misuse of hazardous and toxic chemicals, facilitating a safe environment for consumers and employees, and encouraging corporate responsibility.

ERC has identified violations of California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (“Proposition 65”), which is codified at California Health & Safety Code §25249.5 *et seq.*, with respect to the products identified below. These violations have occurred and continue to occur because the alleged Violator identified below failed to provide required clear and reasonable warnings with these products. This letter serves as a notice of these violations to the alleged Violator and the appropriate public enforcement agencies. Pursuant to Section 25249.7(d) of the statute, ERC intends to file a private enforcement action in the public interest 60 days after effective service of this notice unless the public enforcement agencies have commenced and are diligently prosecuting an action to rectify these violations.

General Information about Proposition 65. A copy of a summary of Proposition 65, prepared by the Office of Environmental Health Hazard Assessment, is attached with the copy of this letter served to the alleged Violator identified below.

Alleged Violator. The name of the company covered by this notice that violated Proposition 65 (hereinafter the “Violator”) is:

Multivitamin Direct, individually and doing business as Raw Green Organics and RawJuvenate

Consumer Products and Listed Chemicals. The products that are the subject of this notice and the chemical in those products identified as exceeding allowable levels are:

**Raw Green Organics RawJuvenate Organic Vegan Protein Vanilla Flavor - Lead
Raw Green Organics RawJuvenate Organic Super Greens - Lead**

May 23, 2014

Page 2

On February 27, 1987, the State of California officially listed lead as a chemical known to cause developmental toxicity, and male and female reproductive toxicity. On October 1, 1992, the State of California officially listed lead and lead compounds as chemicals known to cause cancer.

It should be noted that ERC may continue to investigate other products that may reveal further violations and result in subsequent notices of violations.

Route of Exposure. The consumer exposures that are the subject of this notice result from the purchase, acquisition, handling and recommended use of these products. Consequently, the primary route of exposure to these chemicals has been and continues to be through ingestion, but may have also occurred and may continue to occur through inhalation and/or dermal contact.

Approximate Time Period of Violations. Ongoing violations have occurred every day since at least May 23, 2011, as well as every day since the products were introduced into the California marketplace, and will continue every day until clear and reasonable warnings are provided to product purchasers and users or until these known toxic chemicals are either removed from or reduced to allowable levels in the products. Proposition 65 requires that a clear and reasonable warning be provided prior to exposure to the identified chemicals. The method of warning should be a warning that appears on the product label. The Violator violated Proposition 65 because it failed to provide persons handling and/or using these products with appropriate warnings that they are being exposed to these chemicals.

Consistent with the public interest goals of Proposition 65 and a desire to have these ongoing violations of California law quickly rectified, ERC is interested in seeking a constructive resolution of this matter that includes an enforceable written agreement by the Violator to: (1) reformulate the identified products so as to eliminate further exposures to the identified chemicals, or provide appropriate warnings on the labels of these products; and (2) pay an appropriate civil penalty. Such a resolution will prevent further unwarned consumer exposures to the identified chemicals, as well as an expensive and time consuming litigation.

ERC has retained me as legal counsel in connection with this matter. **Please direct all communications regarding this Notice of Violations to my attention at the law office address and telephone number indicated on the letterhead.**

Sincerely,



William F. Wraith

Attachments

Certificate of Merit

Certificate of Service

OEHHA Summary (to Multivitamin Direct, individually and doing business as Raw Green Organics and RawJuvenate, and its Registered Agent for Service of Process only)

Additional Supporting Information for Certificate of Merit (to AG only)

CERTIFICATE OF MERIT

**Re: Environmental Research Center's Notice of Proposition 65 Violations by
Multivitamin Direct, individually and doing business as Raw Green Organics and
RawJuvenate**

I, William F. Wraith, declare:

1. This Certificate of Merit accompanies the attached 60-day notice in which it is alleged the party identified in the notice violated California Health & Safety Code Section 25249.6 by failing to provide clear and reasonable warnings.

2. I am an attorney for the noticing party.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who have reviewed facts, studies, or other data regarding the exposure to the listed chemicals that are the subject of the notice.

4. Based on the information obtained through those consultants, and on other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiff's case can be established and that the information did not prove that the alleged Violator will be able to establish any of the affirmative defenses set forth in the statute.

5. Along with the copy of this Certificate of Merit served on the Attorney General is attached additional factual information sufficient to establish the basis for this certificate, including the information identified in California Health & Safety Code §25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

Dated: May 23, 2014



William F. Wraith

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am a citizen of the United States, over the age of 18 years of age, and am not a party to the within entitled action. My business address is 306 Joy Street, Fort Oglethorpe, Georgia 30742. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Fort Oglethorpe, Georgia.

On May 23, 2014, I served the following documents: **NOTICE OF VIOLATIONS OF CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; “THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (PROPOSITION 65): A SUMMARY”** on the following parties by placing a true and correct copy thereof in a sealed envelope, addressed to the party listed below and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Certified Mail:

Current President or CEO
Multivitamin Direct, individually and
doing business as Raw Green Organics
and RawJuvenate
2150 Paragon Drive
San Jose, CA 95131

Current President or CEO
Multivitamin Direct, individually and doing
business as Raw Green Organics and
RawJuvenate
1325 S Howard Avenue, #810
Burlingame, CA 94010

Current President or CEO
Multivitamin Direct, individually and
doing business as Raw Green Organics
and RawJuvenate
716 San Antonio Road
Palo Alto, CA 94303

VCorp Services CA, Inc.
(Registered Agent for Multivitamin Direct,
individually and doing business as
Raw Green Organics and RawJuvenate)
5670 Wilshire Blvd, Suite 1530
Los Angeles, CA 90036

On May 23, 2014, I electronically served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT; ADDITIONAL SUPPORTING INFORMATION FOR CERTIFICATE OF MERIT AS REQUIRED BY CALIFORNIA HEALTH & SAFETY CODE §25249.7(d)(1)** on the following party by uploading a true and correct copy thereof on the California Attorney General's website, which can be accessed at <https://oag.ca.gov/prop65/add-60-day-notice>:

Office of the California Attorney General
Prop 65 Enforcement Reporting
1515 Clay Street, Suite 2000
Oakland, CA 94612-0550

On May 23, 2014, I served the following documents: **NOTICE OF VIOLATIONS, CALIFORNIA HEALTH & SAFETY CODE §25249.5 ET SEQ.; CERTIFICATE OF MERIT** on each of the parties on the Service List attached hereto by placing a true and correct copy thereof in a sealed envelope, addressed to each of the parties on the Service List attached hereto, and depositing it at a U.S. Postal Service Office with the postage fully prepaid for delivery by Priority Mail.

Executed on May 23, 2014, in Fort Oglethorpe, Georgia.



Tiffany Capehart

Notice of Violations of California Health & Safety Code §25249.5 *et seq.*

May 23, 2014

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Service List

District Attorney, Alameda County 1225 Fallon Street, Suite 900 Oakland, CA 94612	District Attorney, Los Angeles County 210 West Temple Street, Suite 18000 Los Angeles, CA 90012	District Attorney, San Diego County 330 West Broadway, Suite 1300 San Diego, CA 92101	District Attorney, Tuolumne County 423 N. Washington Street Sonora, CA 95370
District Attorney, Alpine County P.O. Box 248 Markleeville, CA 96120	District Attorney, Madera County 209 West Yosemite Avenue Madera, CA 93637	District Attorney, San Francisco County 850 Bryant Street, Suite 322 San Francisco, CA 94103	District Attorney, Ventura County 800 South Victoria Ave, Suite 314 Ventura, CA 93009
District Attorney, Amador County 708 Court Street Jackson, CA 95642	District Attorney, Marin County 3501 Civic Center Drive, Room 130 San Rafael, CA 94903	District Attorney, San Joaquin County 222 E. Weber Ave. Rm. 202 Stockton, CA 95202	District Attorney, Yolo County 301 2 nd Street Woodland, CA 95695
District Attorney, Butte County 25 County Center Drive, Suite 245 Oroville, CA 95965	District Attorney, Mariposa County Post Office Box 730 Mariposa, CA 95338	District Attorney, San Luis Obispo County 1035 Palm St, Room 450 San Luis Obispo, CA 93408	District Attorney, Yuba County 215 Fifth Street, Suite 152 Marysville, CA 95901
District Attorney, Calaveras County 891 Mountain Ranch Road San Andreas, CA 95249	District Attorney, Mendocino County Post Office Box 1000 Ukiah, CA 95482	District Attorney, San Mateo County 400 County Ctr., 3 rd Floor Redwood City, CA 94063	Los Angeles City Attorney's Office City Hall East 200 N. Main Street, Suite 800 Los Angeles, CA 90012
District Attorney, Colusa County 346 Fifth Street Suite 101 Colusa, CA 95932	District Attorney, Merced County 550 W. Main Street Merced, CA 95340	District Attorney, Santa Barbara County 1112 Santa Barbara Street Santa Barbara, CA 93101	San Diego City Attorney's Office 1200 3rd Avenue, Ste 1620 San Diego, CA 92101
District Attorney, Contra Costa County 900 Ward Street Martinez, CA 94553	District Attorney, Modoc County 204 S Court Street, Room 202 Alturas, CA 96101-4020	District Attorney, Santa Clara County 70 West Hedding Street San Jose, CA 95110	San Francisco, City Attorney City Hall, Room 234 1 Dr Carlton B Goodlett PL San Francisco, CA 94102
District Attorney, Del Norte County 450 H Street, Room 171 Crescent City, CA 95531	District Attorney, Mono County Post Office Box 617 Bridgeport, CA 93517	District Attorney, Santa Cruz County 701 Ocean Street, Room 200 Santa Cruz, CA 95060	San Jose City Attorney's Office 200 East Santa Clara Street, 16 th Floor San Jose, CA 95113
District Attorney, El Dorado County 515 Main Street Placerville, CA 95667	District Attorney, Monterey County Post Office Box 1131 Salinas, CA 93902	District Attorney, Shasta County 1355 West Street Redding, CA 96001	
District Attorney, Fresno County 2220 Tulare Street, Suite 1000 Fresno, CA 93721	District Attorney, Napa County 931 Parkway Mall Napa, CA 94559	District Attorney, Sierra County PO Box 457 Downieville, CA 95936	
District Attorney, Glenn County Post Office Box 430 Willows, CA 95988	District Attorney, Nevada County 201 Commercial Street Nevada City, CA 95959	District Attorney, Siskiyou County Post Office Box 986 Yreka, CA 96097	
District Attorney, Humboldt County 825 5th Street 4 th Floor Eureka, CA 95501	District Attorney, Orange County 401 West Civic Center Drive Santa Ana, CA 92701	District Attorney, Solano County 675 Texas Street, Ste 4500 Fairfield, CA 94533	
District Attorney, Imperial County 940 West Main Street, Ste 102 El Centro, CA 92243	District Attorney, Placer County 10810 Justice Center Drive, Ste 240 Roseville, CA 95678	District Attorney, Sonoma County 600 Administration Drive, Room 212J Santa Rosa, CA 95403	
District Attorney, Inyo County 230 W. Line Street Bishop, CA 93514	District Attorney, Plumas County 520 Main Street, Room 404 Quincy, CA 95971	District Attorney, Stanislaus County 832 12 th Street, Ste 300 Modesto, CA 95354	
District Attorney, Kern County 1215 Truxtun Avenue Bakersfield, CA 93301	District Attorney, Riverside County 3960 Orange Street Riverside, CA 92501	District Attorney, Sutter County 446 Second Street Yuba City, CA 95991	
District Attorney, Kings County 1400 West Lacey Boulevard Hanford, CA 93230	District Attorney, Sacramento County 901 "G" Street Sacramento, CA 95814	District Attorney, Tehama County Post Office Box 519 Red Bluff, CA 96080	
District Attorney, Lake County 255 N. Forbes Street Lakeport, CA 95453	District Attorney, San Benito County 419 Fourth Street, 2 nd Floor Hollister, CA 95023	District Attorney, Trinity County Post Office Box 310 Weaverville, CA 96093	
District Attorney, Lassen County 220 South Lassen Street, Ste. 8 Susanville, CA 96130	District Attorney, San Bernardino County 316 N. Mountain View Avenue San Bernardino, CA 92415-0004	District Attorney, Tulare County 221 S. Mooney Blvd., Room 224 Visalia, CA 93291	